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IN THE
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FILED
J.N. Jan 7, 2008
JAN X 7 2008

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

CHERYL HENNESSEY,
Plaintiffs,

v.

COOK COUNTY, TODD H. STROGER,
and DOROTHY BROWN,
Defendants.

)
)
)
) 08CV130
) JUDGE ZAGEL
) MAG. JUDGE MASON
)
)
)

COMPLAINT

Plaintiff, Cheryl Hennessey, states as follows:

1. Plaintiff is a United States citizen who resides in Cook County, Illinois.
2. Plaintiff is employed by Defendants as a courtroom clerk and she is currently assigned to a felony courtroom in Markham, Illinois.
3. Plaintiff has worked as a courtroom clerk since 2000 and was promoted to a felony courtroom assignment in 2003.
4. Plaintiff is currently disabled but she is able to work as a courtroom clerk, provided she does not have to walk up and down stairs or sit or drive for more than 15-20 minutes consecutively.
5. Plaintiff has been under doctor's care for many months and underwent surgery in April, 2007.

6. As a result of that surgery and a pre-existing condition, Plaintiff is in chronic pain.

7. Plaintiff cannot drive for more than 15-20 minutes because of the pain in her legs and back.

8. Plaintiff has alerted her employers, the Defendants, to her medical situation.

9. Plaintiff is able to perform her assigned duties at the Markham court facility.

10. Her drive to court at that facility is less than 15 minutes.

11. Plaintiff is assigned to a courtroom on the first floor at Markham and she can park a short distance from the court facility.

12. In her current assignment Plaintiff is able to perform her duties competently, as she has for several years.

13. Defendants, however, have transferred Plaintiff to the Daley Center in downtown Chicago.

14. That assignment requires a drive of 45-60 minutes each way.

15. Plaintiff's disability prevents her from driving that far so she cannot accept that re-assignment.

16. Defendants offered Plaintiff the option of staying in Markham provided Plaintiff take a substantial pay reduction.

17. Other courtroom clerks were given the option of taking a pay adjustment of one level.


18. Plaintiff was offered the option of staying in Markham provided she accept a four level reduction.

19. Defendants have refused to make reasonable accommodations for Plaintiff's disability.

20. Plaintiff filed a charge with EEOC and she has received a right to sue letter.

21. Defendants are discriminating against Plaintiff based on her disability.

WHEREFORE, Plaintiff prays that court will grant her any and all appropriate relief.


CHERYL HENNESSEY